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September 8, 2008

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: **Commercial Mobile Service Provider Elections Regarding Participation in the Commercial Mobile Alert System, PS Docket No. 08-146**

Dear Ms. Dortch:

We submit this letter on behalf of USA Mobility, Inc. in compliance with the Commission's requirement that all commercial mobile service ("CMS") providers file a letter describing their election regarding participation in the Commercial Mobile Alert System ("CMAS").¹ USA Mobility elects to participate in whole in the CMAS. Specifically, USA Mobility agrees to transmit alerts in a manner consistent with the technical standards, protocols, procedures, and other technical requirements implemented by the Commission. USA Mobility also commits its support to the development and deployment of technology for the "C" interface, the CMS provider Gateway, the CMS provider infrastructure, and mobile devices with CMAS functionality and support for the CMS provider technology.

USA Mobility's high-powered paging transmissions and use of simulcasting technology will not enable the targeting of messages at the level of individual counties. USA Mobility notes, however, that the Commission has authorized paging providers to exceed the geographical

¹ *The Commercial Mobile Alert System*, Third Report and Order, PS Docket No. 07-287, FCC 08-184, ¶ 32 (2008).

targeting requirements to the extent required by their networks.² Accordingly, USA Mobility will transmit alerts at the level of its simulcast zones (*i.e.*, the most granular level available).

Additionally, because the paging market is not characterized by the regular introduction of new paging devices, there is very little turnover of pagers. In fact, in contrast to the mobile phone market, most paging customers have retained the same pagers for several years and will not likely upgrade in the near future (and may not have the opportunity to do so). As a result, it will be necessary for existing customers to contact USA Mobility to arrange for pager modifications that will support emergency alerts.

USA Mobility is pleased to participate in the CMAS. Please direct any questions regarding its election to the undersigned.

Sincerely,



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² *The Commercial Mobile Alert System*, First Report and Order, PS Docket No. 07-287, FCC 08-99, ¶ 56 (2008) (“In those limited circumstances where the propagation area of a paging system ... exceeds a single county, we will permit the RF signal carrying the alert to extend beyond a county’s boundaries.”).